

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

TRUE VALUE COMPANY, L.L.C., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-12337 (KBO)

(Jointly Administered)

NOTICE OF SECOND AMENDED² AGENDA FOR HEARING SCHEDULED
FOR DECEMBER 4, 2024 AT 9:30 A.M. (ET)

**NO MATTERS ARE GOING FORWARD. THE HEARING IS CANCELLED WITH
THE PERMISSION OF THE COURT.**

ADJOURNED MATTERS

1. Notice of Proposed Assumption and Assignment of Certain Executory Contracts [[D.I. 339, 11/6/24](#)]

Objection Deadline: November 18, 2024 at 4:00 p.m. (ET), as may have been extended for certain parties

Related Documents:

- A. Motion of Debtors for Entry of an Order (I) Establishing Bidding, Noticing, and Assumption and Assignment Procedures, (II) Approving the Sale of Substantially All of the Debtors' Assets, and (III) Granting Related Relief [[D.I. 12, 10/14/24](#)]
- B. Order (I) Approving the Bid Protections; (II) Approving the Assumption and Assignment Procedures; (III) Authorizing and Approving the Form of Notice of the Sale of Substantially All of the Assets of the Debtors; (IV) Authorizing and

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: True Value Company, L.L.C. (9896); TV Holdco II, L.L.C. (2272); TV TSLC, L.L.C. (7025); TV GPMC, L.L.C. (8136); True Value Retail, L.L.C. (7946); TrueValue.com Company, L.L.C. (6386); True Value Virginia, L.L.C. (9197); and Distributors Hardware, L.L.C. (8106). The address of the Debtors' corporate headquarters is 8600 W. Bryn Mawr Ave. Chicago, IL 60631.

² **Amendments appear in bold.**

Scheduling the Sale Hearing and Setting Other Related Dates and Deadlines; and
(V) Granting Related Relief [[D.I. 297, 11/4/24](#)]

C. Order (A) Approving Sale of Substantially All of Debtors' Assets Free and Clear of All Claims, Liens, Rights, Interests, and Encumbrances, (B) Authorizing Debtors to Enter Into and Perform Under Asset Purchase Agreement, (C) Approving Assumption and Assignment of Certain Executory Contracts, and (D) Granting Related Relief [[D.I. 411, 11/13/24](#)]

D. First Supplemental Notice of Proposed Assumption and Assignment of Certain Executory Contracts [[D.I. 416, 11/13/24](#)]

Objections Filed:

A. See Schedule A, attached

Status: This matter has been adjourned to January 16, 2025 at 1:00 p.m. (ET).

2. Notice of Supplement to the Debtors' Bidding Procedures and Sale Motion [[D.I. 12](#)] Requesting Entry of an Order Approving TSA Contract Assumption and Assignment Procedures [[D.I. 556, 11/20/24](#)]

Objection Deadline: November 27, 2024 at 4:00 p.m. (ET), extended for certain parties

Related Documents:

A. Motion of Debtors for Entry of an Order (I) Establishing Bidding, Noticing, and Assumption and Assignment Procedures, (II) Approving the Sale of Substantially All of the Debtors' Assets, and (III) Granting Related Relief [[D.I. 12, 10/14/24](#)]

B. Order (A) Approving Sale of Substantially All of Debtors' Assets Free and Clear of All Claims, Liens, Rights, Interests, and Encumbrances, (B) Authorizing Debtors to Enter Into and Perform Under Asset Purchase Agreement, (C) Approving Assumption and Assignment of Certain Executory Contracts, and (D) Granting Related Relief [[D.I. 411, 11/13/24](#)]

Objections Filed:

A. Informal Comments

- i. Committee of Unsecured Creditors
- ii. Landlord for Plymouth MWG 1750 South Lincoln LLC

Status: This matter is adjourned to December 17, 2024 at 1:30 p.m. (ET).

CONTESTED MATTER GOING FORWARD

3. Motion of Debtors for Entry of an Order Authorizing and Directing the U.S. Trustee to Appoint an Official Committee of Retired Employees [[D.I. 116, 10/21/24](#)]

Objection Deadline: October 28, 2024 at 4:00 p.m. (ET), extended for the United States Trustee and the Committee

Related Documents:

- A. Notice of Withdrawal of Reservation of Rights of the Official Committee of Unsecured Creditors to Motion of Debtors for Entry of an Order Authorizing and Directing the U.S. Trustee to Appoint an Official Committee of Retired Employees [[D.I. 466, 11/18/24](#)]
- B. Certification of Counsel [[D.I. 653, 12/3/24](#)]
- C. Order Authorizing and Directing the U.S. Trustee to Appoint an Official Committee of Retired Employees [[D.I. 655, 12/3/24](#)]

Objections\Responses Filed:

- A. Informal comments from U.S. Trustee
- B. Reservation of Rights of the Official Committee of Unsecured Creditors to Motion of Debtors for Entry of an Order Authorizing and Directing the U.S. Trustee to Appoint an Official Committee of Retired Employees [D.I. 453, 11/16/24] (withdrawn)
- C. [SEALED] Reservation of Rights of the Official Committee of Unsecured Creditors to Motion of Debtors for Entry of an Order Authorizing and Directing the U.S. Trustee to Appoint an Official Committee of Retired Employees [D.I. 538, 11/19/24]
- D. [REDACTED] Reservation of Rights of the Official Committee of Unsecured Creditors to Motion of Debtors for Entry of an Order Authorizing and Directing the U.S. Trustee to Appoint an Official Committee of Retired Employees [[D.I. 648, 12/2/24](#)]

Status: **An order has been entered.**

[Signature Page Follows]

Dated: December 3, 2024

**YOUNG CONAWAY STARGATT
& TAYLOR, LLP**

/s/ Timothy R. Powell

Edmon L. Morton (Del. Bar No. 3856)
Kenneth J. Enos (Del. Bar No. 4544)
Kristin L. McElroy (Del. Bar No. 6871)
Timothy R. Powell (Del. Bar No. 6894)
One Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Email: emorton@ycst.com
kenos@ysct.com
kmcclroy@ycst.com
tpowell@ycst.com

*Efficiency Counsel to the
Debtors and Debtors in Possession*

**SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP**

Joseph O. Larkin
One Rodney Square
920 N. King Street
Wilmington, Delaware 19801
Telephone: (302) 651-3000
Email: Joseph.Larkin@skadden.com

- and -

Ron E. Meisler (admitted *pro hac vice*)
Jennifer Madden (admitted *pro hac vice*)
320 South Canal Street
Chicago, Illinois 60606-5707
Telephone: (312) 407-0705
Email: Ron.Meisler@skadden.com
Jennifer.Madden@skadden.com

- and -

Robert D. Drain (admitted *pro hac vice*)
Evan A. Hill (admitted *pro hac vice*)
Moshe S. Jacob (admitted *pro hac vice*)
One Manhattan West
New York, New York 10001
Telephone: (212) 735-3000
Email: Robert.Drain@skadden.com
Evan.Hill@skadden.com
Moshe.Jacob@skadden.com

*Counsel to Debtors and
Debtors in Possession*

SCHEDULE A**Summary of Cure Objections and Responses**

	OBJECTION	SPECIFIC OBJECTION
INFORMAL RESPONSES		
1.	Jeld-Wen, Inc.	Confirming whether omission was an oversight
2.	Hartline Prod Co Inc	Objection to listed cure amount
3.	Air Vent Inc.	Request for additional time to review listed contracts
4.	Architectural Mailboxes	Request for Debtor's counsel to sell contracts listed in the assumption schedule
5.	Solar Group	Request for Debtor's counsel to sell contracts listed in the assumption schedule
6.	Brass Craft	Request final revised list
7.	Delta Faucet Company	Request final revised list
8.	Ez-Ad Tv	Request final revised list
9.	Masterchem Industries	Request final revised list
10.	Universal Forest Products	Request final revised list
11.	Fortune Prod Inc	Request for additional time to review listed contracts
12.	Jm Smucker Retail Sales	Request for additional time to review listed contracts
13.	World Marketing Of America	Request for additional time to review listed contracts, objection to listed cure amount
14.	Schneider Logistics, Inc.	Negotiating prepetition balance
15.	Schneider National Carriers	Negotiating prepetition balance
16.	United Healthcare Services	Requesting information on post-closing contract elections
17.	Infor (US) LLC	Objection to listed cure amount
18.	Georgia Pacific Corporation	Request for additional time to review listed contracts
19.	Reliance Water Heater Co	Objection to listed cure amount
20.	Stearns Packaging Corporation	Objection to listed cure amount
21.	International Forest Products Corp	Request for additional time to review listed contracts
22.	Fifth Third Bank	Objection to listed cure amount
23.	Global Experience Specialists, Inc. (GES)	Objection to listed cure amount

	OBJECTION	SPECIFIC OBJECTION
24.	First Financial Corporate Leasing, LLC	Objection to listed cure amount
25.	WPC Holdco LLC	Request for additional time to review listed contracts
26.	Forney Industries Inc	Objection to listed cure amount
27.	Great Plains Ind Inc	Request for additional time to review listed contracts
28.	Kubota Tractor Corporation	Request for additional time to review listed contracts
29.	Allied Barton Security Services	Request for additional time to review listed contracts
30.	Pennzoil/Quaker State	Objection to listed cure amount
31.	Highline Warren/Plews	Objection to listed cure amount
32.	Freudenberg Filtration Tech	Request for additional time to review listed contracts; Objection to listed cure amount
33.	Protect Plus Industries	Confirming whether omission was an oversight
34.	Gorilla Glue Company	Request for additional time to review listed contracts; Objection to listed cure amount
35.	Bonide Products Inc	Request for additional time to review listed contracts
36.	Arrow Fastener Company, LLC	Request for Debtor's counsel to sell contracts listed in the assumption schedule
37.	Bona Kemi USA Inc	Request for additional time to review listed contracts
38.	Prime Line Products	Request for additional time to review listed contracts
39.	Fletcher Terry Company	Confirming whether omission was an oversight
40.	Master Gardner Company	Objection to listed cure amount
41.	Cargill Inc	Request for additional time to review listed contracts; Objection to listed cure amount
FORMAL OBJECTIONS		
42.	Objection of STNL II (Harvard), LLC [D.I. 425, 11/14/24]	Objection to listed cure amount
43.	McCoy's Building Supply's Limited Objection [D.I. 427, 11/14/24]	Objection to listed cure amount
44.	Madix Inc's Objection and Reservation of Rights [D.I. 439, 11/15/24]	Objection to listed cure amount
45.	462 Thomas Family Properties, L.P.'s Limited Objection [D.I. 443, 11/15/24]	Objection to listed cure amount

	OBJECTION	SPECIFIC OBJECTION
46.	Limited Objection and Reservation of Rights of Somerset Leasing XXV, LLC as Successor-in-Interest to Somerset Capital Group, Ltd., Itself Successor-in-Interest to ARC Equipment Finance LLC, Somerset Leasing Corp. 27, as Successor-in-Interest to ARC Equipment Finance LLC [D.I. 444, 11/15/24]	Objection to listed cure amount
47.	Niagara Bottling, LLC's Objection [D.I. 445, 11/15/24]	Objection to listed cure amount
48.	Generac Power Systems, Inc.'s Objection [D.I. 450, 11/15/24]	Objection to listed cure amount
49.	Whirlpool Corporation's Objection [D.I. 451, 11/15/24]	Objection to listed cure amount
50.	InSinkErator, LLC's Objection [D.I. 452, 11/15/24]	Objection to listed cure amount
51.	Charlotte Pipe and Foundry Company's Objection [D.I. 458, 11/18/24]	Objection to listed cure amount
52.	Huber Engineered Woods LLC's Objection [D.I. 459, 11/18/24]	Objection to listed cure amount
53.	The Hillman Group's Objection [D.I. 461, 11/18/24]	Objection to listed cure amount
54.	Calumet Branded Products, LLC's Objection and Reservation of Rights [D.I. 463, 11/18/24]	Objection to listed cure amount
55.	Norma Group's Objection and Reservation of Rights [D.I. 464, 11/18/24]	(Withdrawn) [D.I. 469]
56.	Manhattan Associates, Inc's Limited Objection [D.I. 465, 11/18/24]	Objection to listed cure amount
57.	Manhattan Associates, Inc's Limited Objection [D.I. 465, 11/18/24]	Objection to listed cure amount
58.	Elkay Sales, LLC's Objection [D.I. 467, 11/18/24]	Objection to listed cure amount
59.	Zurn Pex, Inc's Objection [D.I. 468, 11/18/24]	Objection to listed cure amount
60.	Norma Group's Objection and Reservation of Rights [D.I. 470, 11/18/24]	Objection to listed cure amount
61.	Virginia Abrasives Corporation [D.I. 471, 11/18/24]	Objection to listed cure amount
62.	DDP Specialty Electronic Materials US, LLC's Limited Objection [D.I. 472, 11/18/24]	Objection to listed cure amount
63.	Plymouth MWG 1750 South Lincoln LLC's Objection and Reservation of Rights [D.I. 473, 11/18/24]	Objection to listed cure amount
64.	Black & Decker (U.S.), Inc's Objection and Reservation of Rights [D.I. 474, 11/18/24]	Objection to listed cure amount
65.	VP Racing Fuels, Inc's Objection and Reservation of Rights [D.I. 476, 11/18/24]	Objection to listed cure amount
66.	Oatey Supply Chain Services, Inc's Limited Response and Reservation of Rights [D.I. 477, 11/18/24]	Objection to listed cure amount
67.	CertainTeed Gypsum, Inc., GCP Applied Technologies Inc., Saint-Gobain Abrasives Inc., and Saint-Gobain Adfors America, Inc's Limited Objection [D.I. 481, 11/18/24]	Objection to listed cure amount

	OBJECTION	SPECIFIC OBJECTION
68.	Ferrellgas, L.P., d/b/a Blue Rhino's Objection and Reservation of Rights [D.I. 482, 11/18/24]	Objection to listed cure amount
69.	Limited Objection and Reservation of Rights of Hexaware Technologies [D.I. 485, 11/18/24]	Objection to listed cure amount
70.	Objection and Reservation of Rights of Mansfield Oil [D.I. 486, 11/18/24]	Objection to listed cure amount
71.	Objection and Reservation of Rights of Experis US LLC / Experis Manpower Group [D.I. 487]	Objection to listed cure amount
72.	Limited Objection of Hultafors Group North America, Inc. / Johnson Level & Tool / Custom Leathercraft [D.I. 488, 11/18/24]	Objection to listed cure amount
73.	Limited Objection and Reservation of Rights of Scotts Company LLC [D.I. 489, 11/18/24]	Objection to listed cure amount
74.	Limited Objection and Reservation of Rights of Plaskolite Inc [D.I. 490, 11/18/24]	Objection to listed cure amount
75.	Limited Objection and Reservation of Rights of Worthington Enterprises, Inc. [D.I. 491, 11/18/24]	Objection to listed cure amount
76.	Limited Objection and Reservation of Rights of The Sherwin-Williams Company [D.I. 492, 11/18/24]	Objection to listed cure amount
77.	Objection to Cure and Reservation of Rights The Milwaukee Metropolitan Sewerage District a/k/a Milorganite [D.I. 494, 11/18/24]	Objection to listed cure amount
78.	Limited Objection and Reservation of Rights of Berry Global [D.I. 495, 11/18/24]	Objection to listed cure amount
79.	Objection and Reservation of Rights of Cintas Corporation No. 2 [D.I. 496, 11/18/24]	Objection to listed cure amount
80.	WPC Landlords' Limited Objections [D.I. 497, 11/18/24]	Objection to listed cure amount
81.	Limited Objection and Reservation of Rights of Toter Incorporated [D.I. 498, 11/18/24]	Objection to listed cure amount
82.	Limited Objection of Primesource Building Prod. [D.I. 499, 11/18/24]	Objection to listed cure amount
83.	Objection of OXO International Ltd., Helen of Troy, L.P. , and KAZ USA, Inc. [D.I. 500, 11/18/24]	Objection to listed cure amount
84.	Limited Objection and Reservation of Rights of Ors Nasco LLC [D.I. 501, 11/18/24]	Objection to listed cure amount
85.	Objection of Granite (12 Tradeport) LLC [D.I. 502, 11/18/24]	Objection to listed cure amount
86.	Objection of Monrovia Nursery Company [D.I. 503, 11/18/24]	Objection to listed cure amount
87.	DAP Global Inc. (Touch N Foam) [D.I. 504, 11/18/24]	Objection to listed cure amount
88.	Limited Objection of DAP Global Inc., DAP Global Inc. (Touch N Foam), DAP Inc. [D.I. 504, 11/18/24]	Objection to listed cure amount
89.	Limited Objection of Rust-Oleum [D.I. 504, 11/18/24]	Objection to listed cure amount
90.	Limited Objection of Appleton Group LLC and Easy Heat Inc [D.I. 505, 11/18/24]	Objection to listed cure amount
91.	Objection of AmeriGas Propane L.P. [D.I. 506, 11/18/24]	Objection to listed cure amount

	OBJECTION	SPECIFIC OBJECTION
92.	Limited Objection of Copeland Comfort Control LP [D.I. 507, 11/18/24]	Objection to listed cure amount
93.	Limited Objection of Clean Earth Environmental Services [D.I. 508, 11/18/24]	Objection to listed cure amount
94.	Limited Objection of Westinghouse Lighting LP [D.I. 509, 11/18/24]	Objection to listed cure amount
95.	Limited Objection of Ridge Tool Co (Emerson Professional Tools) [D.I. 510, 11/18/24]	Objection to listed cure amount
96.	Objection of STIHL Southeast, Inc. [D.I. 511, 11/18/24]	Objection to listed cure amount
97.	Objection of STIHL Inc [D.I. 511, 11/18/24]	Objection to listed cure amount
98.	Objection of Crader Distributing Company [D.I. 511, 11/18/24]	Objection to listed cure amount
99.	Objection of Bryan Equipment Sales, Inc [D.I. 511, 11/18/24]	Objection to listed cure amount
100.	Objection of Blue Mountain Arts Inc [D.I. 511]	Objection to listed cure amount
101.	Limited Objection of Imperial Manufacturing Group USA Inc [D.I. 512, 11/18/24]	Objection to listed cure amount
102.	Objection and Reservation of Rights of Bird B Gone Inc [D.I. 514, 11/18/24]	Objection to listed cure amount
103.	Objection and Reservation of Rights of B&G Equipment [D.I. 514, 11/18/24]	Objection to listed cure amount
104.	Limited Objection and Reservation of Rights of Toledo & Co Inc [D.I. 515, 11/18/24]	Objection to listed cure amount
105.	Limited Objection and Reservation of Rights of Weber-Stephen Products [D.I. 516, 11/18/24]	Objection to listed cure amount
106.	Objection and Reservation of Rights of Huntington Technology Finance, Inc. [D.I. 517, 11/18/24]	Objection to listed cure amount
107.	Objection of Tingley Rubber [D.I. 518, 11/18/24]	Objection to listed cure amount
108.	Objection of Blaster Chemical Company [D.I. 519, 11/18/24]	Objection to listed cure amount
109.	Limited Objection of U S Gypsum [D.I. 520, 11/18/24]	Objection to listed cure amount
110.	Objection of CIT Bank, a division of First Citizens Bank & Trust Company [D.I. 523, 11/18/24]	Objection to listed cure amount
111.	Limited Objection of Raymond Handling Concepts [D.I. 525, 11/18/24]	Objection to listed cure amount
112.	Limited Objection of Raymond Handling Concepts Corporation [D.I. 525, 11/18/24]	Objection to listed cure amount
113.	La Crosse Technology's Objection [D.I. 541, 11/19/24]	Objection to listed cure amount
114.	Objection of Franklin Hardware #22194 [D.I. 551, 11/19/24]	Objection to listed cure amount
115.	Objection of Apex Tool Group, LLC [D.I. 558, 11/21/24]	Objection to listed cure amount
116.	Limited Objection of Arrowhead Brass and Plumbing LLC [D.I. 560, 11/21/24]	Objection to listed cure amount
117.	Objection of Freudenberg Filtration Technologies, L.P. [D.I. 563, 11/21/24]	Objection to listed cure amount

	OBJECTION	SPECIFIC OBJECTION
118.	Objection of Protect Plus Industries, Inc. [D.I. 563, 11/21/24]	Objection to listed cure amount
119.	Objection of World Marketing of America, Inc. [D.I. 566, 11/22/24]	Objection to listed cure amount
120.	Objection of Gibraltar Industries, Inc. [D.I. 575, 11/22/24]	Objection to listed cure amount
121.	Objection of The J. M. Smucker Company and Smucker Retail Foods, Inc. [D.I. 576, 11/22/24]	Objection to listed cure amount
122.	Limited Objection and Reservation of Rights of Fifth Third Bank, N.A. [D.I. 580, 11/22/24]	Objection to listed cure amount
123.	Objection of Highline Warren, LLC [D.I. 581, 11/22/24]	Objection to listed cure amount
124.	Objection of Salesforce, Inc. [D.I. 596, 11/25/24]	Objection to listed cure amount
125.	Limited Objection of EZ-AD TV Inc. [D.I. 604, 11/25/24]	Objection to listed cure amount
126.	Limited Objection and Reservation of Rights of Forney Industries, Inc. [D.I. 608, 11/25/24]	Objection to listed cure amount
127.	Objection and Reservation of Rights of Global Experience Specialists, Inc. [D.I. 611, 11/25/24]	Objection to listed cure amount
128.	Objection and Reservation of Rights of Infor (US) LLC [D.I. 612, 11/25/24]	Objection to listed cure amount
129.	Objection of CorVel Enterprise Comp, Inc. [D.I. 613, 11/25/24]	Objection to listed cure amount
130.	Objection of Fortune Brands Innovations, Inc. [D.I. 614, 11/25/24]	Objection to listed cure amount
131.	Limited Objection and Reservation of Rights of Cargill, Incorporated [D.I. 615, 11/25]	Objection to listed cure amount
132.	Reservation of Rights of International Forest Products LLC [D.I. 616, 11/25/24]	Reservation of rights
133.	Objection of Fisher Printing, Inc. [D.I. 633, 11/27/24]	Objection to listed cure amount